



HDOT MS4 Audit Work Plan

Kickoff Meeting

June 30th 2016





Agenda

Introductions / Schedule

Specific Consent Decree Requirements

Response to Letter from HDOH

Key Elements of Audit Work Plan

Next Steps

Specific Consent Decree Requirements

- A.1. The audits shall be completed to fulfill the following goals:
- a. **Determine compliance** with the federal regulations and state MS4 permits and regulations and this Consent Decree (see Paragraph A.2, below);
 - b. Ensure information gathered during the audits is used to **promote information and technology transfer** between divisions; and
 - c. Identify deficiencies and potential violations that are discovered by the third party auditor and **allow for timely self-correction** of the deficiencies and potential violations by HDOT.

Specific Consent Decree Requirements

B.6. The Audit Work Plan shall include, but is not limited to:

- the minimum **documents to be reviewed** (e.g. SWMPs, training records, inspection reports, etc.)
- minimum **number of field verifications**, as necessary, for each program element evaluated
- **deliverables** (notices of potential violations, draft and final audit reports), and
- reporting **deadlines**

Specific Consent Decree Requirements

D.7. The HDOT Audit Reports shall contain:

- a. A specific statement of the procedures followed, HDOT sites and activities visited and all materials reviewed during the audits;**
- b. Retrospective analysis of activities that may be outmoded, ineffective, insufficient, or excessively burdensome, and recommendations to modify, streamline, or expand them in accordance with what has been learned;**
- c. An identification of deficiencies (items which, if not corrected, will lead to potential violations) and potential violations with the applicable SWMPs, this Consent Decree, and/or applicable permit and regulations, and recommendations for improvement;**
- d. Identification of best practices and opportunities for information/technology transfer to be applied across all divisions; and**
- e. An analysis of the practices implemented for each Division's program elements and a determination as to whether identified best practices can be universally implement across all three Divisions. If best practices cannot be universally implemented, the report shall clearly describe the identified impediments.**

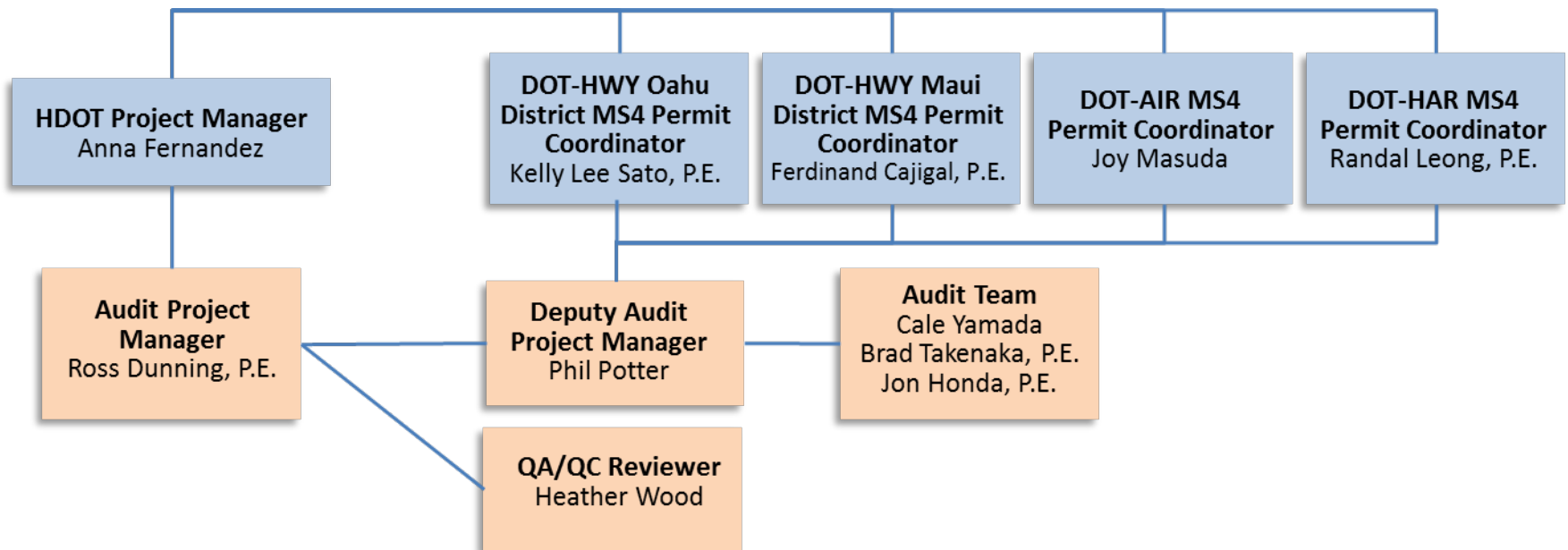
Letter from HDOH (19 February 2016)

1. Overall, the draft work plan does not provide the **level of detail** necessary for the DOH to approve of the plan.
2. The work plan must clearly **detail the method/process** by which each of the HDOT's pollution prevention programs will be analyzed.
3. The work plan must also include details such as **timeframes** for the audits and a **dedicated process** for how recommendations will be vetted.

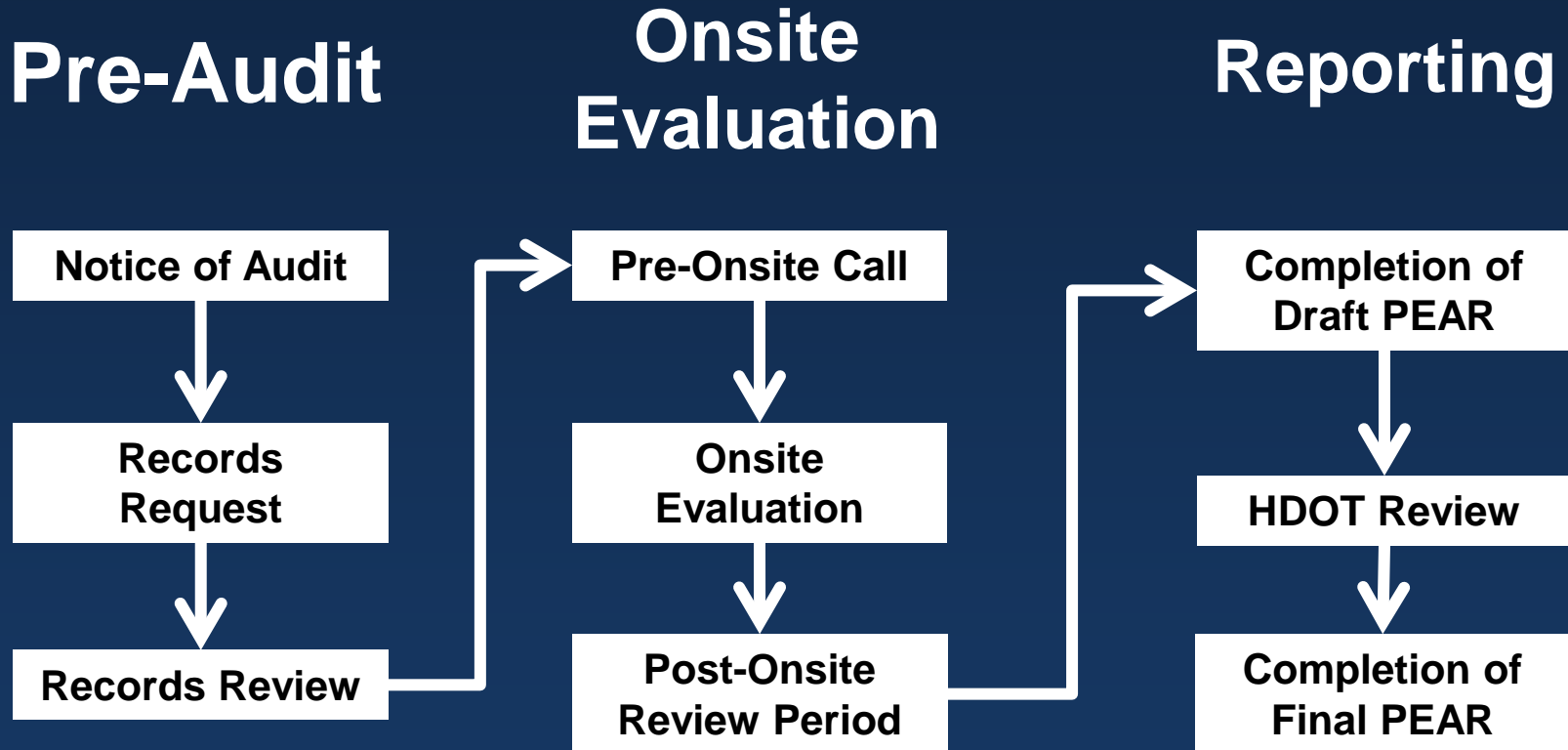
Letter from HDOH (19 February 2016)

1. The work plan must also:
 - a. Identify the specific **staff** person(s) needed to complete interviews
 - b. **Key elements** of each NPDES regulated activity
 - c. Note which **specific program activities** will be audited
2. The work plan must clearly define the **deliverable** that is expected from the auditor.

Organizational Chart



Typical Audit Workflow



Onsite Evaluation – Post-Construction

Airports		Harbors		Highways	
Kahului Airport	Honolulu International Airport	Honolulu Harbor	Kalaheo Barbers Point Harbor	Maui District	Oahu District
Small MS4 Permit	Individual Permit	Small MS4 Permit	Small MS4 Permit	Small MS4 Permit	Individual Permit
HI 4KE349	HI S000005	HI 03KB482	HI 03KB488	HI 14KE352	HI S000001
61 Days After AWP	62 Days After AWP	64 Days After AWP	65 Days After AWP	61 Days After AWP	63 Days After AWP
Monday 20 March 2017	Tuesday 21 March 2017	Thursday 23 March 2017	Friday 24 March 2017	Monday 20 March 2017	Wednesday 22 March 2017
8am – 9am Kickoff Meeting	8am – 9am Kickoff Meeting	8am – 9am Kickoff Meeting	8am – 9am Kickoff Meeting	1pm – 2pm Kickoff Meeting	8am – 9am Kickoff Meeting
9am – 11am Onsite Evaluation	9am – 11am Onsite Evaluation	9am – 11am Onsite Evaluation	9am – 11am Onsite Evaluation	2pm – 4pm Onsite Evaluation	9am – 11am Onsite Evaluation
BMP 1: OGG CONRAC, location tentative	BMP 1: Pervious pavement and bioswale systems, NDWP New Employee Parking Lots at Elliott St	BMP 1: Alaska Marine Lines, Pier 29	BMP 1: GLP Asphalt Facility	[BMPs will be inspected only if they are installed by this time]	BMP 1: University Ave. Bioswales, In median of H-1 ramps to University Ave. on makai side of freeway
BMP 2: Wash rack, location tentative	BMP 2: Contech CDS 2025 System and FloGuard drop inlet filtration insert, NDWP Diamondhead Site Improvements, GSE Lot fronting Hardstand 3	BMP 2: Matson Auto Facility, Pier 32	[Additional BMPs will be inspected only if they are installed by this time]		BMP 2: Fort Weaver Rd. CDS Units, Fort Weaver Rd., Ewa
[An additional BMP will be inspected only if one is installed by this time]	BMP 3: Bioswale system, Kalewa St Storage Lots 1-6, Corner of Lagoona and Kalewa St.	BMP 3: HC&D Facility, Pier 60			BMP 3: Luluku Storm Water Treatment System, H-3/Likelike interchange, Kaneohe
11am – 12pm Debrief Meeting	11am – 12pm Debrief Meeting	11am – 12pm Debrief Meeting	11am – 12pm Debrief Meeting	4pm – 5pm Debrief Meeting	11am – 12pm Debrief Meeting

Verify that up to three (3) structural and source control BMPs approved by each permittee and subject to post-construction requirements were installed and are being maintained properly in the field.

On-Site Evaluation Dates (Tentative)

Table 2: On-Site Evaluation Dates

PEAR	On-Site Evaluation
Post-Construction / Permanent Best Management Practices	Monday, 20 March 2017 to Friday, 25 March 2017
Construction Site Runoff Control	Monday, 11 September 2017 to Friday, 15 September 2017
Public Outreach / Public Involvement Program	[none required]
Illicit Discharge Detection and Elimination Program Element and Industrial Commercial Activities/Tenant Program	Monday, 6 August 2018 to Monday, 13 August 2018
Pollution Prevention / Good Housekeeping Program	Monday, 28 January 2019 to Friday, 1 February 2019
Staffing, Funding, Organizational Structure, Availability of Resources, and Storm Water Program Sustainability	[none required]

Guiding Questions from EPA (2007)

Program Element Audit Report (PEAR) #1 Post-Construction / Permanent BMPs

- A Overall Approach
- B Ordinance/Legal Authority
- C Post-Construction BMP Standards
- D Plan Review and Approval Procedures
- E Post-Construction BMP Inventory
- F BMP Inspection & Maintenance
- G Enforcement
- H Public Construction Projects
- I Consent Decree Questions



Guiding Questions from EPA (2007)

Appendix A1: PEAR #1 – Post-Construction / Permanent Best Management Practices

Question Number	Question	Airports		Harbors		Highways	
		Kahului Airport	Honolulu International Airport	Honolulu Harbor	Kalaeloa Barbers Point Harbor	Maui District	Oahu District
		Small MS4 Permit	Individual Permit	Small MS4 Permit	Small MS4 Permit	Small MS4 Permit	Individual Permit
		HI 14KE349	HI S000005	HI 03KB482	HI 03KB488	HI 14KE352	HI S000001
A	Overall Approach						
A1	Discuss the process chronologically in the order that a project would occur. Walk us through the process as if we were a developer proposing a project.						
B	Ordinance/Legal Authority						
B1	What legal authority does the permittee have to require post-construction BMPs on development sites and to ensure maintenance?						
B2	Does the permittee's legal authority address post-construction requirements for all projects disturbing one acre or more?						
B3	Does the legal authority require site design, source control, and stormwater treatment BMPs?						
B4	What exemptions does the ordinance or other legal authority allow?						
B5	What procedures for alternative compliance (i.e., planning-level BMPs and other non-structural controls) are allowed?						
B6	Does the legal authority authorize the permittee to require stormwater management plans to address post-construction impacts?						
B7	Does the ordinance outline the contents of an approvable plan and responsibilities for operation and maintenance of approved BMPs?						
C	Post-Construction BMP Standards						
C1	What technical guidance (e.g., BMP manual) does the permittee use as the standard for design and selection of post-construction BMPs? Note: It is not necessary to do a thorough review of the manual or standards used by the permittee.						
C2	Are project proponents required to follow a technical guidance manual?						
C3	Does the guidance provide siting and use criteria for the BMPs to ensure proper and adequate BMPs are being selected and implemented?						
C4	Does the guidance provide siting and use criteria for BMP selection based on the development context (i.e., BMP selection appropriate for <u>ultra urban</u> areas versus those more appropriate for more rural settings with larger parcels)?						
C5	Are pollutants of concern that are typically generated by the proposed development type considered when selecting or approving BMPs?						
C6	Does the technical manual provide guidance on sizing, performance, and location of BMPs?						
C7	When was the BMP manual last updated?						
C8	Does the permittee have different requirements or standards for different types of developments (e.g., specific post-construction requirements for gas stations or automobile repair facilities)?						
C9	Does the permittee have design manuals related to land-efficient site designs (e.g. better site design, better models for large retailers)?						
C10	Does the permittee promote source control and site design standards to reduce the generation of pollutants in addition to treatment BMPs?						

Guiding Questions from EPA (2007)

Program Element Audit Report (PEAR) #2 Construction Site Runoff Control

- A Ordinance/Legal Authority**
- B Construction Site Inventory**
- C Construction Requirements and BMPs**
- D Plan Review Procedures**
- E Construction Site Inspections**
- F Program Support and Resources**
- G Enforcement**
- H Training and Education**
- I Public Construction Projects**
- J Consent Decree Questions**



Guiding Questions from EPA (2007)

Program Element Audit Report (PEAR) #3 Public Outreach / Public Involvement

- A Goals and Objectives
- B Message Development
- C Target Audiences
- D Message Packaging
- E Distribution Mechanisms
- F Evaluation Methods
- G Public Participation Activities
- H Consent Decree Questions



Guiding Questions from EPA (2007)

Program Element Audit Report (PEAR) #4

Illicit Discharge Detection and Elimination (IDDE) Program Element and Industrial Commercial Activities/Tenant (I/C) Program

IDDE

- A Legal Authority**
- B Mapping**
- C Field Screening**
- D Investigation of Potential Illicit Discharges**
- E Spill Response and Prevention**
- F Public Awareness and Reporting Program**
- G Preventing Sanitary Sewer Discharges**
- H Education and Training**

I/C

- I Legal Authority**
- J Facility Inventory**
- K Standards, BMPs and Outreach**
- L Staff Training**
- M Inspections**
- N Program Support and Resources**
- O Enforcement**
- P Consent Decree Questions**

Guiding Questions from EPA (2007)

Program Element Audit Report (PEAR) #5 Pollution Prevention / Good Housekeeping

- A Infrastructure Mapping and Characterization
- B Catch Basin Cleaning
- C Stormwater Management Structures
- D Street Sweeping
- E Public Streets, Roads and Highway Maintenance
- F Facility Inventory
- G Chemical and Hazardous Material Use and Disposal
- H Pesticide, Herbicide and Fertilizer Application and Management
- I Municipal Staff
- J Contracted Services Staff
- K Training and Education
- L Consent Decree Questions



Guiding Questions from EPA (2007)

Program Element Audit Report (PEAR) #6

**Staffing, Funding, Organizational Structure, Availability of Resources, and Storm
Water Program Sustainability**

A SWMP Planning Documents

B Staff Inventory and Organization

C Performance Standards or Goals

D Prioritization of Resources

E Assessment and Evaluation of Programs

F Assessment and Evaluation of BMPs

G Assessment and Evaluation of Water Quality

H Dry & Wet Weather Outfall Screening and Monitoring (If Applicable)

I Biological Monitoring (If Applicable)

J Ambient Monitoring (If Applicable)

K Data Collection and Reporting

L Consent Decree Questions

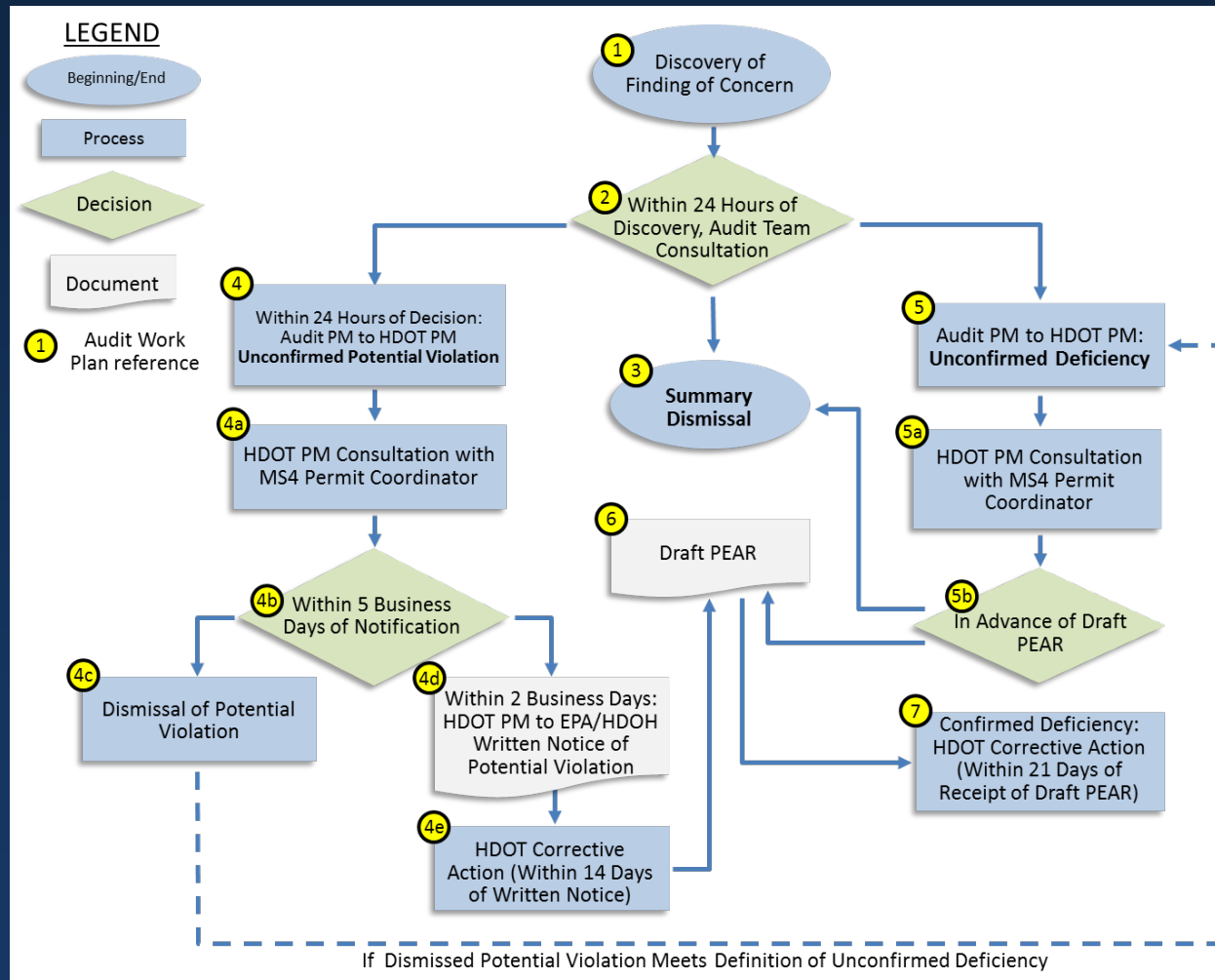


Responding to Findings of Concern

From CD:

HDOT shall require the audit firm to provide preliminary written notice of any potential violations identified in any audit to HDOT, EPA and HDOH within 2 business days following an audit of a program element in Paragraph B.1, above.

Responding to Findings of Concern



Next Steps

September 1st – HDOT submits Draft Audit Work Plan to EPA for review

No later than October 17th (+ 45 days) – EPA provides comments

No later than December 1st (+ 45 days) – HDOT submits revised Final Audit Work Plan to EPA review

No later than January 16th (+ 45 days) – EPA provides comments, if any

No later than January 18th – HDOT addresses any remaining comments, Audit Work Plan Acceptance (starts clock)

Figure 2: Program Element Audit Schedule

	2017												2018												2019											
PEAR	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
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